

Nevada Division of Environmental Protection
Solid Waste Branch
333 W. Nye Lane
Carson City, Nevada 89706

Solid Waste Fact Sheet

Revised February 2004

Household Hazardous Waste Permanent Collection Facility Guideline

Background

State regulations require more populated counties in Nevada to implement household hazardous waste (HHW) collection programs. This fact sheet is meant to serve as a guideline for local governments to use in designing their programs.

Regulation

All household wastes are exempt by definition from the Federal hazardous waste regulations (40 CFR 261.4 (b)(1)). The exemption from hazardous waste regulations applies to HHW, even when collected in large quantities. However, when HHW is mixed with hazardous wastes from commercial generators that generate more than 100 kg per month or store more than 1000 kg onsite, the resulting mixture is regulated as a hazardous waste. For this reason, sponsors of HHW collection programs must be careful to limit the participation in their program to households and conditionally exempt small quantity generators (CESQG's).

Household waste, including HHW, is subject to the State solid waste regulations. The collection facility and program operation, must be approved by the solid waste management authority.

Although HHW is excluded from federal and State hazardous waste regulations, NDEP recommends that sponsors of HHW collection programs manage the collected HHW as a hazardous waste. If the waste cannot be reused or recycled, it should be transported to a hazardous waste treatment or disposal facility. NDEP also recommends the use of licensed hazardous waste transporters who will properly identify, label, manifest, and transport the collected wastes for recycling or treatment.

Liability

Sponsors of HHW programs are not liable for failure to follow hazardous waste regulations and are not required to obtain a permit for a hazardous waste management facility as long as the waste is not treated at the collection site. However, CERCLA, the federal Superfund law, does not contain an exclusion from liability for household waste. Any waste that qualifies as a hazardous substance under CERCLA is subject to the liability provisions of Section 107. Basically, Section 107 states that if the disposal site to which the HHW is sent is later identified as a significant source of pollution and named a "Superfund" cleanup site, the sponsors of a HHW collection program could be held joint and severally liable for the costs to clean up the site. Therefore, the additional safeguards provided by managing HHW as hazardous waste and selecting a reputable treatment facility may reduce potential CERCLA liability. General liability insurance should be obtained to cover accidents occurring at the collection facility. Coverage may be part of the sponsor's insurance policy, or a contractor involved in the program may name the sponsor as "additional insured" on its policy.

Operating Standards

This section includes excerpts from Federal and State hazardous waste regulations regarding waste handling and storage. The standards are listed to serve as a guideline for proper handling and management of HHW.

Collection

- Accept household and CESQG wastes only. A facility that accepts wastes from commercial entities must have evidence of their status as a CESQG (conditionally exempt small quantity generator). A CESQG generates less than 100 kilograms (approx. 26 gallons) of hazardous waste in each calendar month, and never allows more than 1000 kg (approx. 260 gal) of hazardous waste to accumulate onsite at any one time. The Bureau of Waste Management (775-687-9462), Program Development and Coordination Branch, can provide a list of CESQG's. If there is any doubt about the amount of hazardous waste that the generator produces per month, do not accept the waste and refer the individual to the Small Business Development Center (1-800-882-3233). Programs that accept CESQG waste may want to charge a fee to those participants.
- Limit the types and quantities of wastes accepted. Five gallons or 50 pounds is a common threshold. Return wastes that are not accepted to the owner and inform them of their options for safe disposal or storage.
- Accept only original, legible labelled containers, or containers with the contents known to the owner. Do not accept any unknown or unidentified material. If any unknown material is brought to the collection center, site personnel should obtain the name and address of the owner and as much information about the material as possible. The owner should be made aware of safe disposal options.
- Accept structurally sound and sealed containers. If material is brought in an open or leaking container, the material must be properly packaged before acceptance and storage.
- Control access to the facility at all times.

Storage

- Segregate incompatible materials with space and/or barriers. Flammable materials, poisons and corrosives (bases) should be segregated from oxidizers and corrosives (acids).
- Maintain sufficient aisle space to allow movement of personnel and emergency equipment.
- Place placards designating locations for wastes of a particular hazard category (ie. flammable, corrosive, poison, etc.). If drums are used, tape a log sheet to the lid, mark a hazard category on the log sheet, and affix a hazardous waste label to the drum. Keep lids on drums except when materials are being placed in them. Prior to shipment, lab-pack wastes in the drum according to 40 CFR 365.316 standards.

Pesticides, (which include herbicides, insecticides, fungicides, and rodenticides), fall within the poison category. However, in some instances pesticides are packaged with a low percentage of pesticide mixed with a high percentage of inert materials or solvent. If the solvent is flammable some judgement is required to determine whether the material is best classified as a poison or as a flammable material.
- Storage shelves or containers must be corrosion resistant.
- The storage area should be constructed with a secondary containment system.
- Ventilate the storage area adequately to prevent the buildup of toxic gases and vapors.

- Inspect the storage area and safety equipment regularly (ie. at the start and end of each day).
- Do not store wastes longer than 90 days.

Record Keeping

- Maintain a log of waste type, amount, date and time received, and storage location.
- Submit a biennial hazardous waste report to the Bureau of Waste Management, Program Development and Coordination Branch if you are required by the disposal facility or transporter to obtain an EPA Identification Number. Complete the report as a "nongenerator." For more information on the report, contact the Bureau of Waste Management at (775) 687-9462.
- Keep records on file for a minimum of three years.

Transport

- Although not regulated as a generator, the transporter or disposal facility may require the program sponsor to obtain or use an active EPA Identification Number. To receive a number assignment the sponsor must file a "Notification of Regulated Waste Activity." Application forms can be obtained from the Bureau of Waste Management (687-9462). It will take 4-6 weeks to be assigned a number on average. Notify NDEP of any changes in personnel or mailing address once a number is assigned. Each number is location-specific.
- Ship all wastes from the collection site to a treatment, storage, or disposal facility (TSDF) with a Federal Uniform Hazardous Waste Manifest Form. Manifests can normally be obtained from the waste transporter. Other sources include equipment safety stores and the Bureau of Waste Management (775-687-9462).
- Use licensed hazardous waste transporters that have an EPA identification number. Transporters can typically be found in the yellow pages. To obtain information on a transporters' violation record, contact the Bureau of Waste Management at 687-9462.

Reuse, Recycling, and Disposal

- All paints should be reused to the greatest extent possible. Latex paints can be reused "as-is" or reprocessed and distributed to local governments, citizen, recreation, or school groups, etc. as beige recycled paint. Latex paint can also be dried and landfilled. Small quantities of oil-based paint from residential households can be dried in open air prior to disposal in a municipal landfill, provided the paint is not from commercial sources. Spreading the paint out in some type of bin or on a piece of wood or cardboard, or adding an adsorbent (ie. sand or kitty litter) will expedite the drying process. Solvents or large quantities of oil-based paint that are ignitable should be managed by a permitted TSDF.
- Pesticides that are properly labeled and packaged can be reused. The preferred method of disposing of pesticides and herbicides that are banned or cannot be reused is incineration.
- Search out TSDF's that have no previous violations and are properly managed and permitted to accept wastes that cannot be reused or recycled.

Prevention and Emergency Procedures

- Equip the storage area with a fire extinguisher, an emergency shower, spill control equipment, an eye wash, and a telephone or radio. Check with the office of the State Fire to determine what type of fire extinguisher is compatible with the wastes stored at the site.

- Separate the facility from the surrounding environment with a bermed, impervious concrete pad or other barrier.
- The floor or containment system beneath the storage containers must be impervious. It also must be sloped to drain and remove liquid resulting from leaks, unless the containers are protected from contact with accumulated liquids.
- The containment system should have the capacity to hold the volume of the largest liquid container, or 10% of the cumulative amount being stored, whichever is larger.
- Post a procedure for handling spills and a list of emergency telephone numbers (fire department, hospital, NDEP, etc.) at the facility.
- To the extent possible, spills should be contained through use of an absorbent by facility personnel. Absorbed waste should be drummed and labeled.
- Make arrangements with local emergency service providers for emergency response.
- Post "No Smoking" signs in conspicuous places.
- Proper personal protective equipment should be provided and used during regular work activities and emergencies.
- All employees should attend an OSHA health and safety training course in accordance with 29 CFR 1910.120 and 1910.1200. In addition, program sponsors must comply with the General Industry Standards (29 CFR 1910) which govern employee safety and health in the workplace. Contact the Safety Consultation and Training Section (SCATS) of the Nevada Division of Industrial Relations for information on training requirements and availability. In the Reno area call (775) 688-1474; in the Las Vegas area (702) 486-9143 and in the Elko area call (775) 778-3312.
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Attachments

- Guideline for Segregating Collected Materials. County of San Bernardino, Dept. of Environmental Health Services.

A GUIDELINE FOR SEGREGATING COLLECTED MATERIALSFLAMMABLES AND COMBUSTIBLES

Acetone	Linseed oil
Adhesives	Liquid wastes (check ingredients)
Air freshener	Liquid sandpaper
Alcohols	Methanol
Asphalt driveway topping	Naphtha
Automotive body filler	Neats foot oil
Automotive oils	Oils
Barbecue lighter fluid	Organic solvents
Benzene	Paint strippers
Brake fluid	Paint thinners
Creosote	Paraffin oil
Cutting oil	Perfume
Dap	Petroleum distillates
Diesel fuel	Plastic model cement
Denatured alcohol	Plastic roof cement
Duplicator fluid	Polyurethane cement (unsolidified)
Enamel/oil-based paint	Power steering fluid
Epoxy paint	Primers
Ethanol	Roofing cement
Ether	Rug/upholstery cleaners
Fiberglass resins (unsolidified)	Sealers
Fingernail polish remover	Shellac thinner
Floor/furniture polish	Spot remover/dry cleaning fluids
Formaldehyde solution	Thinner
Formalin	Tile cement
Gasoline	Tire black
Glues	Toluene
Grease	Transmission fluid
Isopropyl Alcohol	Turpentine
Kerosene	Varnish
Lacquer paint	Wallpaper cement
Latex paint (unsolidified)	WD-40
Latex/water-based paint	White gas
Lighter fluid	Wood/tile putty
	Wood stain
	Xylol/xylene

OXIDIZERS

Ammonium nitrate	Hydrogen peroxide
Bleach	Iodine
Calcium hypochlorite	Nitric acid
Chlorates	Peroxides
Fertilizers	Potassium permanganate
Fluorine	Sodium hypochlorite
Hair coloring	Toilet bowl cleaner with bleach
Hair dye	

POISONS

Ant and roach killer
Anti-freeze
Bacterial pipe cleaner
Baygon
Black flag
Chlordane
Chrome-silver polishes
DDT
Diazinon
Dimethylamine salts
Disinfectants
Dog repellent
Dursban
Ethylene glycol
Flea spray/powder
Fungicides
Gopher killer
Insect sprays
Lindane

Malathion
Methylene chloride
Mole killer
Moth crystals
"OFF" insect spray
Pentachlorophenol
Pharmaceuticals
Plant food
Pruning paint
Pyrethrins
Raid
Rock salt
Rose dust
Round-up
Sevin (dust)
Snail/slug killer
Strychnine
Tree root/stump killer
Weed and grass killer
Windshield wiper fluid

HEAVY METALS

Arsenic
Bordeaux Mix
Chromium

Copper sulfate
Lead arsenate
Lead compounds
Mercury

CORROSIVES (ACIDS)

Boric acid
Car battery acid
Copper cleaners/metal cleaners
Disinfectants
Ferric chloride
Hydrochloric acid

Muriatic acid
Phosphoric acid
Pool acid
Sheep dip
Sodium bisulfate
Toilet bowel cleaners

CORROSIVES (BASES)

Ammonia and ammonia based cleaners
Battery terminal cleaner
Caustic soda
Cess pool cleaners

Drain cleaners
Lye
Oven cleaners